

DAVID T. WEI (SBN 230729)
MARCEL F. DE ARMAS (SBN 289282)
JAYSON S. SOHI (SBN 293176)
AXCEL LAW PARTNERS LLP
4 Embarcadero Center, 14th Floor
San Francisco, CA 94111
Telephone: 415-704-8800
Facsimile: 415-704-8804
Email: dwei@ax-law.com

Attorneys for PLAINTIFF DAVID R. SISKIN

DONALD R. WILD (SBN 046156)
ENOCH WANG (SBN 218904)
WILD, CAREY & FIFE
100 Montgomery Street, Suite 1410
San Francisco, CA 94104
Telephone: 415-837-3101
Facsimile: 415-837-3111
Email: enochwang@wcandf.com

Attorneys for DEFENDANT SURELL ACCESSORIES, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID R. SISKIN,

Plaintiff,

v.

SURELL ACCESSORIES, INC.

Defendant.

Case No.: CASE No. 4:15-cv-00139-JSW

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE ALL DEADLINES PENDING
SETTLEMENT AGREEMENT**

Pursuant to Civil L.R. 6-2, Plaintiff David R. Siskin ("Plaintiff") and Defendant Surell Accessories, Inc. ("Defendant") hereby jointly request that the Court extend all pending deadlines by 45 days to allow the parties to complete a formal settlement agreement. The parties reached settlement terms on April 29, 2015.

Pursuant to Civil L.R. 6-2(a)(1), the parties state the following:

1. The parties have been discussing settlement.

2. The parties reached agreement on settlement terms and have begun drafting a formal settlement agreement, and they anticipate filing a notice of voluntary dismissal on or before May 29, 2015.

3. Accordingly, the parties jointly and respectfully request that the Court extend the pending deadlines as follows to provide sufficient time to finalize a settlement agreement and meet the terms thereof:

Event	Presently Scheduled Date	Proposed Date
Last day for Plaintiff to file Answer or otherwise respond to Counterclaims	Apr. 30, 2015	June 15, 2015
Last day for Plaintiff to serve Disclosure of Asserted Claims and Infringement Contentions and Accompanying Document Production	May 1, 2015	June 15, 2015
Last day for Defendant to serve Invalidity Contentions and Accompanying Document Production	June 15, 2015	July 30, 2015
Last day for Parties to exchange proposed claim terms for construction	June 29, 2015	Aug. 13, 2015
ADR: Court mediation to be completed	July 16, 2015	Aug. 31, 2015
Parties to exchange preliminary claim construction and extrinsic evidence	July 20, 2015	Sept. 3, 2015
Deadline for either party to request leave to designate more than ten terms for claim construction	July 31, 2015	Sept. 14, 2015
Last day for Parties to file and serve joint claim construction and prehearing statement	Aug. 14, 2015	Sept. 28, 2015
Claim Construction discovery cutoff	Sept. 14, 2015	Oct. 29, 2015
Last day for Plaintiff to file opening claim construction brief	Oct. 13, 2015	Nov. 27, 2015
Last day for Defendant to file responsive claim construction brief	Oct. 27, 2015	Dec. 11, 2015
Last day for Plaintiff to file reply claim construction brief; last day for parties to file an amended, final joint claim construction statement	Nov. 3, 2015	Dec. 18, 2015

4. Pursuant to Civil L.R. 6-2(a)(2), the parties previously requested three extensions of time for Defendant to respond to and answer the Complaint. (Dkt. Nos. 12, 13, 18).

5. Pursuant to Civil L.R. 6-2(a)(3), the requested time modification would delay the current case management schedule by 45 calendar days. The tutorial set for December 3, 2015 and claim construction hearing set for December 10, 2015 are VACATED and shall be reset by further order, if necessary.

Dated: April 29, 2015

AXCEL LAW PARTNERS LLP

By: /s/ Marcel F. De Armas
Marcel F. De Armas

Attorney for Plaintiff DAVID R. SISKIN

Dated: April 29, 2015

WILD, CAREY & FIFE

By: /s/ Enoch Wang
Enoch Wang

Attorney for Defendant
Surell Accessories, Inc.

PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: April 30, 2015



U.S. District Judge Jeffrey S. White